

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

VANESSA CHAVEZ,)	
KEITH DISMUKES, and)	
LATASHA TURNER,)	
individually and on behalf of a)	Case No. 12-cv-5563
class of persons similarly situated,)	
)	
Plaintiffs,)	Judge Joan B. Gottschall
)	
v.)	
)	Magistrate Judge Susan E. Cox
HAT WORLD, INC., a Minnesota)	
corporation,)	
)	
Defendant.)	

**PLAINTIFFS' UNOPPOSED MOTION FOR PRELIMINARY APPROVAL
OF THE PARTIES' PROPOSED COLLECTIVE AND CLASS ACTION SETTLEMENT**

Plaintiffs, Vanessa Chavez, Keith Dismukes, and Latasha Turner, individually and on behalf of all persons whom they seek to represent, by their attorneys, moves for the entry of an Order: (1) granting preliminary approval of the Parties' proposed Settlement Agreement; (2) approving the Parties' proposed notice and claim-in program and approving the mailing of the Notice Packet submitted herewith; (3) approving Dahl Administration LLC as the Claims Administrator; (4) granting provisional certification, for settlement purposes only, of the proposed FLSA and Rule 23 Settlement Classes; (5) approving the Named Plaintiffs as the Class Representatives of the Settlement Classes; (6) approving Plaintiffs' Counsel as Class Counsel for the Settlement Classes; (7) setting a date for the Fairness Hearing relating to the settlement. In support of their motion, Plaintiffs submit herewith their Memorandum of Law in support of their motion, and asks that the Court enter the Preliminary Approval Order attached thereto as Exhibit

Respectfully submitted,

VANESSA CHAVEZ, KEITH DISMUKES, and
LATASHA TURNER, individually and on behalf of
a class of persons similarly situated

/s/ James X. Bormes
One of Plaintiffs' Attorneys

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